

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Coalition for Open Democracy, League of)	
Women Voters of New Hampshire, The)	
Forward Foundation, McKenzie Nykamp)	
Taylor, December Rust, Miles Borne, by his)	
next friend Steven Borne, Alexander Muirhead,)	
by his next friend Russell Muirhead, and Lila)	
Muirhead, by her next friend Russell Muirhead,)	
)	
Plaintiffs,)	
)	Civil Action No. 1:24-cv-00312
vs.)	
)	
)	
David M. Scanlan, in his official capacity as)	
New Hampshire Secretary of State, and John)	
Formella, in his official capacity as New)	
Hampshire Attorney General,)	
)	
Defendants.)	

ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Coalition for Open Democracy, League of Women Voters of New Hampshire, The Forward Foundation, McKenzie Nykamp Taylor, December Rust, Miles Borne, Alexander Muirhead, and Lila Muirhead (“Plaintiffs”) respectfully move this court for an order admitting Ming Cheung to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Mr. Cheung is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Cheung to appear before this Court.

2. Mr. Cheung is a member in good standing of the bar of the State of New York and is also admitted to practice before the following courts: the U.S. District Court for the Southern

District of New York and the U.S. Courts of Appeals for the Fourth Circuit, the Fifth Circuit, the Eleventh Circuit, and the D.C. Circuit; he is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Cheung *pro hac vice* in the above-captioned case.

4. Defendants, through counsel, assent to this motion.

WHEREFORE, the Plaintiffs, Coalition for Open Democracy, League of Women Voters of New Hampshire, The Forward Foundation, McKenzie Nykamp Taylor, December Rust, Miles Borne, Alexander Muirhead, and Lila Muirhead, respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of Ming Cheung; and

B. Grant such other and further relief as may be just and equitable.

Date: October 10, 2024

Respectfully submitted,

/s/ Henry R. Klementowicz

Henry R. Klementowicz (N.H. Bar No. 21177)

Gilles R. Bissonnette (N.H. Bar No. 265393)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that he has electronically filed this date the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. This filing is available for viewing and downloading from the ECF system.

Date: October 10, 2024

/s/ Henry R. Klementowicz
Henry R. Klementowicz